

February 23, 2014

Dear Sir,

I am submitting this Email to object to some of the provisions in the Shoshone National Forest Land Management Plan Draft Decision (Daniel J. Jiron, Regional Forester, is the Responsible Official).

My comments are related only to issues within the drainage of the Clarks Fork of the Yellowstone River because that area is the part of the forest with which I am most familiar. I am eligible to make my objections because I submitted by Email: "Comments on the Draft Forest Plan" to <Shoshone_forestplan@fs.fed.us> on 11/19/12. All of my current objections, except #8, were previously covered in my 11/19/12 Email. Objection #8 is made because of a change in a land management classification from Alternative B to Alternative G.

These are my objections:

1. High Lakes Wilderness Study Area: This entire area contains natural features and qualities which would make it an exceptional addition to the nation's system of Wilderness Areas. The forest service should recommend it for inclusion in the Absaroka-Beartooth Wilderness Area. If now is not the time to do it, when will the time be better? If the forest service chooses not to make the recommendation as part of the revised forest plan, it should publicly state when it intends to resolve the final status of the High Lakes Wilderness Study Area and what criteria will be used to evaluate the area's classification.

I feel the forest service may be using the current level of snowmobile use as both a baseline and a justification for maintaining the High Lakes area as a Study Area. This is a faulty approach because today's level of snowmobile use in the Study Area is orders of magnitude greater than what it must have been when the Wyoming Wilderness Act of 1984 was passed. That enabling legislation allowed winter motorized travel "to the extent and degree that occurred when the area was designated." Consequently if the forest service cannot establish the level of snowmobile use (or determine there actually was such use) prior to 1984, it should prohibit snowmobiles in the High Lakes Wilderness Study Area. If supporters of snowmobile use in the Study Area demand access, it is incumbent on them to submit unequivocal documentation of use and the level of snowmobile use prior to 1984.

2. Dead Indian Creek: The portion of Dead Indian Creek to the north of the Wyoming Highway 296 Bridge over the stream should be evaluated as either a Wild River, or as an addition to the Clarks Fork Wild and Scenic River. That lower portion of Dead Indian Creek has the identical natural qualities which convinced the forest service to consider the nearby portion of Sunlight Creek north of the Wyoming Highway 296 Bridge over that stream as being worthy of evaluation as a Wild River. If Sunlight Creek is suitable, why is Dead Indian Creek unsuitable?

3. Clay Butte Area: The area surrounding the upper portion of Forest Road 142 leading to the Clay Butte Fire Lookout is classified as “5.1-Managed Forest and Rangelands”. Because of the outstanding scenic and recreational values on the southern side of Clay Butte, forestry management (e.g. logging, prescribed burns, etc.) and active range management (e.g. fencing, etc.) would be totally inappropriate for that area. The area should be classified as “1.3-Back Country NonMotorized”. In addition, Forest Road 142 should be classified as a “4.3-Back Country Access Corridor” because that is its function.
4. Forest Road 130.1A: Forest Road 130.1A should be closed and totally obliterated between Gilbert Creek and the road’s terminus near the Crazy Lakes, and it should be included as part of the surrounding “1.3-Back Country Recreation” area. For many years irresponsible ATV drivers have pioneered new, unauthorized roads off of Forest Road 130.1A. As a result of those motorized activities, the forest service in Alternative B classified the areas immediately adjacent to the road as “3.5-Back Country Restoration Motorized”. For some reason, the area was reclassified to “3.5B-Back Country Restoration Winter Motorized” in Alternative G. However, the environmental damage requiring remediation was caused by wheeled motor vehicles, not snowmobiles. If the road is not closed, similar damage by irresponsible ATV drivers will occur in the future, and the rehabilitation work will have been in vain.
5. Back Country Winter Motorized Recreation: Much of the area east of U.S. Highway 212 from the Highway Maintenance Camp to the Wyoming/Montana State Line in the direction of Red Lodge is classified as “3.3-Back Country Winter Motorized Recreation”. Some of the area is suitable for snowmobile travel. However, there are a number of localities (e.g. southern margin of the Beartooth Mountains from Beartooth Creek to almost Leaning Tree Creek, the Little Rock Creek/Deep Lake Canyon east of the site of Camp Sawtooth, the Bennett Creek Canyon, the Line Creek Canyon, the Beartooth Mountain Front from the Wyoming/Montana State Line to T56N, etc.) where the exceptionally steep, rocky terrain and/or thick forest cover make them completely unsuitable and unsafe for snowmobiles. The areas unsuitable for snowmobiles should be classified, at the very least, as “1.3-Back Country NonMotorized”.

The narrow strip of land north of the U.S. Highway 212 Corridor between the northwestern corner of island Lake and the northern end of Beartooth Lake, is classified as “3.3B-Back Country Winter Motorized Recreation”. That area is fairly heavily timbered and has steep terrain. Neither condition is suitable for snowmobiles. Consequently, the strip of land should be included in the High Lakes Wilderness Study Area (and included in the proposal to include the High Lakes Wilderness Study Area into the Absaroka-Beartooth Wilderness Area.

6. Line Creek Plateau Research Natural Area: Nonmotorized bikes should be prohibited on trails within the Line Creek Plateau Research Natural Area and on trails in similar terrain on the Beartooth Plateau. Because of the high altitude, the short growing season, and the abundance of extremely moist terrain, the alpine tundra vegetation and soil are easily and severely degraded by bicycle tires. The only way to protect that fragile alpine environment is to keep bicycles off of it.

7. NonMotorized Bicycle Access: The forest's Revised Land Management Plan (e.g. Table 22; page 122) allows the use of nonmotorized bicycles on all forest trails outside of designated Wilderness Areas. This is a very short sighted decision. Many trails (e.g. #6 above, Forest Trails 628 and 761 within the Clarks Fork Wild and Scenic River Corridor, etc.) are totally unsuited for bicycle travel. In addition, all of the trails in the northern part of the forest were constructed for use by hikers and livestock, and they are ill suited for the different usage demands of bicycles. Also, putting bicycles on the same trails with hikers, saddle horses, pack horses, and cattle will create conflicts and potentially dangerous situations.

National forests in Montana and elsewhere have had substantial increased bicycle use on their trails in recent years as bicyclists ride further and further into the back country. Because those forests did not have well-thought-out, comprehensive plans to manage bicycles, trails have been damaged and preventable conflicts have arisen (New York Times Sports Page article by Christina Erb on 10/11/09). The current situation with bicycles is identical to that created by ATV and ORV usage in national forests over the last 15 or 20 years. Initially, the ATVs were present in small numbers, and forest service personnel were not concerned with their potential damaging impacts. However by the time the forest service recognized the ATVs were becoming a major problem, it was often too late to implement reasonable regulations. If the Shoshone National Forest follows a similar, "head in the sand" approach with bicycles, it will have to deal with another preventable problem which will have huge, detrimental, environmental consequences for the forest in the future. The forest needs to be proactive and develop a comprehensive plan for bicycles instead of being reactive to future problems after the "train has already left the station".

8. In Alternative B, the strip of land immediately adjacent to the North Absaroka Wilderness Area from the Wyoming/Montana State Line to the vicinity of Crandall Creek was properly classified as "1.3-Back Country NonMotorized" because of its steep slopes/cliffs and heavy timber. However, Alternate G classifies that same strip of land as "3.3B-Back Country Winter Motorized" even though the area is unsuitable for snowmobiles. The Alternative G classification should be changed back to "1.3-Back Country NonMotorized".

Thank you for considering my objections.

Sincerely,

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Note: * Starting in early March, I am planning to be away from my Bellingham home for an extended period of time, and I will not be able to be contacted by either telephone or Email. However, you may send a letter to my Bellingham address because my mail will be forwarded to me.

